

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CYNTHIA EARLY, on behalf of herself and all others situated, ELECTRONICALLY FILED

CIVIL ACTION NO. 4:20-cv-01678-RLW

Plaintiffs,

v.

HENRY THAYER COMPANY, INC. and
L'ORÉAL USA, Inc.

Defendants.

JOINT MOTION TO AMEND CASE MANAGEMENT ORDER

Plaintiff Cynthia Early, on behalf of herself and all others situated, and Defendants Henry Thayer Company, Inc. and L'Oréal USA, Inc. ("L'Oréal USA") (jointly, "Thayer" unless otherwise indicated), jointly move for an amendment to this Court's Case Management Order, ECF No. 36, extending certain deadlines in Phase One discovery by approximately 60 days. While the parties are working diligently to fulfill their discovery obligations, the parties seek additional time to prepare expert reports. The parties believe many existing deadlines implicating the Court's time and resources can remain in place, preventing delay in resolution of this litigation. The parties jointly request the following amendments:

Paragraph 4(a)(i): Plaintiff shall disclose all expert witnesses and shall provide the reports required by Rule 26(a)(2), Fed. R. Civ. P. by **February 1, 2022**, and shall make expert witnesses available for depositions and have depositions completed by **March 15, 2022**.

Paragraph 4(a)(ii): Defendant shall disclose all expert witnesses and shall provide the reports required by Rule 26(a)(2), Fed. R. Civ. P. by **April 1, 2022**, and shall make expert witnesses available for depositions and have depositions completed by **May 13, 2022**.

Paragraph 4(a)(vi): The parties shall complete all discovery for Phase One by **May 13, 2022.**

All remaining deadlines may remain in place. A proposed order is attached.

Dated: November 24, 2021

Respectfully submitted,

/s/ Steffan T. Keeton

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